

# KING & SPALDING

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September 21, 2016

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (MG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on August 10, 2016, New GM filed a *Petition For Panel Rehearing And Rehearing En Banc of General Motors LLC (GM LLC)* (“**Rehearing Petition**”) with the United States Court of Appeals for the Second Circuit (“**Second Circuit**”) in connection with the Opinion issued on July 13, 2016 by the Second Circuit (“**Opinion**”). On September 14, 2016, the Second Circuit entered an order denying the Rehearing Petition (“**Order**”).<sup>1</sup> Given the Second Circuit’s Order, New GM has sought a stay of the mandate (“**Motion to Stay the Mandate**”). A copy of the Motion to Stay the Mandate is attached as Exhibit “A.”

If the Court has any questions or needs additional information, please let me know.

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<sup>1</sup> Copies of the Rehearing Petition, Opinion and Order have previously been provided to the Court.

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

SD/ja  
Encl.

cc: Parties Set Forth On Schedule “1” Annexed Hereto.

**SCHEDULE 1**

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**Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt. No. 13634]**

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**Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt. No. 13655]**

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**Parties Subject to the Pilgrim Motion to Enforce**

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